

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10300034-2012**
Application Received: **September 16, 2011**
Plant Identification Number: **03-54-103-00034**
Permittee: **Lackawanna Transport Company**
Facility Name: **d/b/a Wetzel County Sanitary Landfill**
Mailing Address: **Route 1, P. O. Box 156A, New Martinsville, WV 26155**

Physical Location:	New Martinsville, Wetzel County, West Virginia
UTM Coordinates:	512.33 km Easting • 4383.75 km Northing • Zone 17
Directions:	From the city of New Martinsville take Route 2 South. Go one mile south. Turn left onto Rt. 180 to the landfill.

Facility Description

The Lackawanna Transport Company d/b/a Wetzel County Sanitary Landfill (WCSL) (NAICS 562212, SIC 4953) is a non-hazardous municipal solid waste (MSW) landfill that began operation in 1960. The facility is a 238-acre Municipal solid waste landfill. The disposal area is 139 acres. The maximum monthly tonnage accepted is 9,999 tons/month. The landfill accepts municipal solid waste, asbestos, construction/demolition debris (CDD), and approved residual waste. There is also a biosolids composting facility at the landfill, which has been in operation since 2001.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	18.6	1.67
Nitrogen Oxides (NO _x)	10.65	2.864
Particulate Matter (PM _{2.5})	1.278	0.054
Particulate Matter (PM ₁₀)	8.52	0.363
Total Particulate Matter (TSP)	50	2.13
Sulfur Dioxide (SO ₂)	14.59	0.001
Volatile Organic Compounds (VOC)	221.05	8.26
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants ¹	Potential Emissions	2010 Actual Emissions
1,1,2- Trichloroethane	5	0.012
Acrylonitrile	5	0.115
Benzene	5	0.028
Carbon Disulfide	5	0.028
Carbontetrachlorine	5	0.001
Carbonyl Sulfide	5	0.006
Chlorobenzene	5	0.006
Xylene	5	0.243
Chloroform	5	0.000
Mercury	5	0.015
Methyl Ethyl Ketone	5	0.097
Methyl Isobutyl Ketone	5	0.023
Toluene	5	0.685
Vinyl Chloride	5	0.087
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		
Regulated Pollutants other than Criteria and HAP	Potential Emissions	2010 Actual Emissions
Non Methane Organic Compounds (NMOC)	265.7 (Projected for 2014)	36.49
<i>Non-methane organic compounds (NMOC) – The actual current emission rate estimate (calculated for year 2010) is 33.10 Mg/yr. The projected closure year is 2060 with a projected maximum uncontrolled NMOC emission rate estimate of 241.0 Mg/yr (265.1 TPY). The NMOC emission rate estimates were calculated using EPA's Landfill Gas Emissions Model (LandGEM) software. The values used for k and Lo were 0.050 year-1 and 169.9 m³/Mg, respectively. The NMOC concentration used in the model was 4000 ppmv. WCSL's Gas Collection and Control System (GCCS) design plan (as required by CO- R23-E-2002-05 (February 27, 2002)) was approved on February 24, 2003 by WVDEP/DAQ.</i>		

¹ The facility estimated maximum potential HAP individual emissions of 5 TPY and maximum total potential HAP emissions of 15 TPY to allow flexibility with acceptance of different waste streams.

Title V Program Applicability Basis

The facility has a design capacity over 2.5 million megagrams and 2.5 million cubic meters as well as has the potential to emit over 100 tons per year of Volatile Organic Compounds (VOC). Therefore, Lackawanna Transport Company d/b/a Wetzel County Sanitary Landfill (WCSL) is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. Part 60
	45CSR23	To Prevent and Control Emissions from Municipal Solid Waste Landfills
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 60 Subpart OOO	Standard of Performance for Nonmetallic Mineral Processing Plants
	40 C.F.R. Part 60 Subpart WWW	Standard of Performance for Municipal Solid Waste Landfills
	40 C.F.R. Part 63 Subpart AAAA	National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
	40 C.F.R. Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and other sources of Fugitive Particulate Matter

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2463	May 15, 2002	
R13-2476A	December 17, 2004	
R13-2731	May 7, 2007	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Since R30-10300034-2007 (MM01) was issued, no changes were made to the WCSL Title V Permit.

The following updates were made in the renewal.

- Updated the year installed for Emission Unit ID, A4, to "2009" from "Future" in Section 1.1 of the Emission Unit Table.
- Added Section 1.2, Active R13, R14, and R19 Permits and Table. The suffixes for the appropriate permit were removed from the citations.
- The regulatory language was updated for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2.
- 45CSR34 incorporates and is now cited with 40 C.F.R. Part 61 because 45CSR15 was repealed. The citation for 3.1.3 has been revised accordingly.
- The boilerplate language for Section 3.3.1 was revised with the addition of Section 3.3.1.d and the citation was also revised to expand the authority of the West Virginia state code.
- Sections 3.5.3 and 3.5.5 were revised according to US EPA Region 3's request that all annual compliance certifications be submitted electronically (e-mail). This is a general change to the boiler plate language.
- The note in Section 3.5.9 has been deleted since there is not a definite schedule for the promulgation of the proposed amendment of 40 C.F.R. Part 60 Subpart WWW. The proposed amendment is still being contemplated by EPA.
- Since 40 C.F.R. Part 60 Subpart WWW was not adopted and incorporated in 45CSR16 [45CSR§16-4.1.b.], 45CSR16 was removed from the citation of Sections 4.1.1 through 4.1.8, 4.2.1 through 4.2.5, 4.4.1 through 4.4.4, 4.5.1, 4.5.2, 5.1.10, 5.2.2, 5.4.2, and 5.4.3. 40 C.F.R. Part 60 Subpart WWW was adopted and incorporated in 45CSR23.

9. In Sections 4.1.2 and 4.1.6, the section number “5.1.6” mentioned in the requirement was changed to “5.1.10.” There were additional sections included in Section 5.0 and these changes of the section numbers were not carried over.
10. In the second sentence of Section 4.1.4, the “s” was removed from parameter to correspond with 40 C.F.R. § 60.753 (c) language.
11. In Section 4.1.9, replaced the references “5.1.12 and 5.1.13” with “5.1.16 and 5.1.17.” During the modification of the first renewal Title V permit, there were additional sections included in Section 5.0 and these changes of the section numbers were not carried over.
12. The citation for Section 4.1.10 was revised from 45CSR15 to 45CSR34 since 45CSR15 was repealed (see Item 4.).
13. Since the capacities of WCSL storage vessels, C1 and C2, are below the capacity requirements of 40 C.F.R. § 60.116b (a), Sections 4.1.11 and 4.1.12 were removed from the permit.
14. In Section 4.4.1, replaced “Section 4.4.2” with “Section 4.4.1” in the requirement that references 40 C.F.R. § 60.758 (b) (1).
15. In Section 4.5.2, replaced “Section 5.4.5” with “Section 5.4.4.” There were additional sections included in Section 5.0 and these changes of the section numbers were not carried over during the modification of the first renewal Title V permit.
16. Citation for Section 5.1.1 was revised with the addition of “Section 4.1.6 and 45CSR§6-4.1” since the emission limit for PM in the table of Section 5.1.1 will demonstrate compliance with 45CSR§6-4.1.
17. The flare system was referenced incorrectly as “01-E1” and “01-F1” in Section 5.1.3. It should be “F1”. Also in Sections 5.1.4 and 5.1.5, the reference should be “F1” instead of “01-F1.”
18. Since EPA has determined that “normal” is not enforceable because it is not defined, “normal” was removed from “during periods of ‘normal’ facility operation” that is in the third sentence of the second paragraph of Section 5.2.1 in the first Title V permit renewal.
19. Sections 6.1.12, 6.3.3, 6.3.4 (1) and (2), and 6.5.1 were modified corresponding to the revised 40 C.F.R. Part 60 Subpart OOO, which was amended April 28, 2009. Sections 6.1.14 and 6.3.5 were not changed since they were not altered in the rework of 40 C.F.R. Part 60 Subpart OOO. Sections 6.1.13 and 6.3.4 (3) were removed since they were not included in the modified 40 C.F.R. Part 60 Subpart OOO. R13-2463 was issued on May 15, 2002, and incorporated 40 C.F.R. Part 60 Subpart OOO, published on August 1, 1985. The citations for these sections of 40 C.F.R. Part 60 Subpart OOO were revised as necessitated.
20. In the second sentence of Section 6.2.1, “45 C.F.R. § 60.675 Subpart OOO” was replaced with “40 C.F.R. § 60.675 Subpart OOO” and “45 C.F.R. Part 60 Appendix” was replaced with “40 C.F.R. Part 60 Appendix” since they were incorrectly referenced.
21. Section 6.3.5 citation was revised to include (1) following 40 C.F.R. § 60.675 (e) since there are additional subsections in 40 C.F.R. § 60.675 (e) of the modified 40 C.F.R. Part 60 Subpart OOO.
22. 40 C.F.R. Part 63 Subpart ZZZZ area source requirements were incorporated as Section 8.0.

WCSL has not made any modifications that would trigger a PSD permit; therefore the requirements of the GHG tailoring rule do not apply.

40 C.F.R. Part 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The Wetzel County Sanitary Landfill has a 533 HP diesel engine that is subject to the area source provisions of 40 C.F.R. Part 63 Subpart ZZZZ. The 533 HP diesel engine was constructed prior to June 12, 2006. The facility shall comply with all applicable requirements of 40 C.F.R. Part 63 Subpart ZZZZ by May 3, 2013 per 40 C.F.R. § 63.6595 (see Section 8.1.1.).

Although non-major area source MACT provisions under 40 C.F.R. Part 63 Subpart ZZZZ are excluded from state delegation in 45CSR34, these requirements are applicable requirements under 45CSR§30-2.6.d, which includes any requirement subject to §112 of the CAA.

The 533 HP engine (DG1) is an existing stationary compression ignition (CI) internal combustion engine that combusts diesel fuel. As stated below, the engine meets the definition for stationary reciprocating internal combustion engines (RICE) according to 40 C.F.R. § 63.6585 (a):

“A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 C.F.R. 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.”

The WCSL engine is in the category of existing stationary engines greater than 500 HP located at an area source of HAPs as established by the RICE regulation.

Engine (DG1) is subject to the requirements for a non-emergency, non-black start CI stationary RICE >500 HP (Limit concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O₂; or reduce CO emissions by 70 percent or more), Table 2d, Item 3.

Following, are the applicable RICE MACT requirements according to the “Summary of Requirements” table provided by EPA.

Emission Unit ID	Emission Limitations	Operating Limitations	Fuel Requirements	Performance Testing	Monitoring Requirements	Initial Compliance	Continuous Compliance	Record-keeping Requirements	Reporting Requirements
DG1 Non-emergency, Non-black start CI stationary RICE>500 HP	§ 63.6603 Table 2d	§ 63.6603 Table 2b	>300 HP with displacement <30 l/cyl: § 63.6604	§ 63.6612 § 63.6615 § 63.6620 Table 3 Table 4 Table 5	§ 63.6625 (a), (b), (g), (h), (k)	§ 63.6630 Table 5	§ 63.6605 § 63.6635 § 63.6640	§ 63.6655 (a), (b), (d)	§ 63.6650 (a) – (f)

Engine (DG1) is also subject to the general provisions of 40 C.F.R. Part 63.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 C.F.R. § 60.757 (a) (3)	The design capacity of this facility is greater than 2.5 million megagrams and 2.5 million cubic meters. Therefore, amended design capacity reports are not required.
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40 C.F.R. Part 64

This is the second permit renewal for this facility. The facility was found not to be subject to CAM at the time of the first renewal since the facility does not have any pollutant specific emissions units (PSEU) that satisfy all of the applicability criteria requirements of 40 CFR § 64.2 (a). Therefore, a CAM determination is not required.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: December 14, 2011
Ending Date: January 13, 2012

All written comments should be addressed to the following individual and office:

Wayne Green
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.